



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, WA 98101

WAD 6819
4/13/03

7001 2510 0006 8610 6663

April 18, 2003

8a

Reply To
Attn Of: WCM-126

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Ernst
Company Energy & Environmental Affairs
The Boeing Company
P.O. Box 3707
MC 7A-WW
Seattle, WA 98124-2207

**Re: Transformer PCB Investigation Work Plan
Boeing Plant 2, Seattle/Tukwila, Washington
EPA ID No. WAD 00925 6819
RCRA Docket No. 1092-01-22-3008(h)**

Dear Mr. Ernst:

Will

By letter dated January 27, 2003 the United States Environmental Agency Region 10 (EPA) approved the Transformer PCB Investigation Work Plan (the Plan) (WESTON, December 2002) as final. The approval was granted in accordance with paragraph 10.3 of the January 1994 Administrative Order on Consent (the Order) and required The Boeing Company (Boeing) to revise the subject Plan responsive to all EPA comments. Additionally, the letter requested Boeing to begin implementation of Phase 1 mobilization in accordance with the schedule provided in Section 7 of the Plan.

The review of the current submittal of the final Transformer PCB Investigation Work Plan (WESTON, February 2003) raised the following concerns:

1. EPA comments No. 6 through 8: Boeing's revised Plan did not fully address EPA's comments No. 6 through 8. Those comments required Boeing to provide a basis for moving forward to Phase 2 and to sample particulates from the storm drains. We understand Boeing proposes meeting with EPA to discuss preliminary Phase 1 results and refine the scope for Phase 2 of the investigation. Based on the schedule provided in Section 7, the draft Report will be submitted to EPA in December 2003, subject to timely attainment by Boeing of all necessary permits and access agreements. EPA strongly encourages Boeing to implement the Plan as soon as possible so the investigation results can be evaluated and proper remedial actions taken as necessary. Extending the field investigation for months does not support Boeing's affirmation to EPA of wishing to complete

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Project Coordinator

SSG Environmental Remediation

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The Boeing Co.

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Seattle, WA 98124

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1. Article Addressed to:

Mr. William D. Ernst
Project Coordinator
SSG Environmental Remediation
The Boeing Co.
P.O. Box 3707, M/C 1W-12
Seattle, WA 98124

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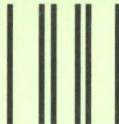
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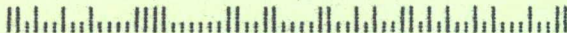
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Office of Waste & Chemicals Management
RCRA Compliance Unit
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Seattle, WA 98101

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corrective action on an expedited schedule.

2. EPA comment No. 10 under Quality Assurance: There are still discrepancies between the Work Plan and the Quality Assurance Project Plan (QAPP) regarding the total number of soil and water samples that will be collected. QAPP Section 3.1 and Tables indicate there may be up to 300 soils and 3 water samples collected, and the Plan Section 4.3.1.1 indicates 264 soil and 4 water samples. This discrepancy must be resolved.
3. EPA comment B under Quality Assurance: The EPA Region 10 Quality Assurance Unit has confirmed the requirement of having a signature page with appropriate signatures for all QAPPs. EPA appreciates Boeing's willingness to comply with this requirement by providing the QAPP's signature page for EPA to sign. However the signature page is missing signature approval lines for Boeing's manager responsible for the project. Please resubmit the signature page signed by Boeing's manager and Boeing's contractor.
4. Section 7, Schedule identifies the receipt of final approval from EPA at some future date. Please note that the final approval of the Plan was provided by EPA with the January 27, 2003 letter. Therefore, January 27, 2003 must be used as the date of the final regulatory approval.

EPA understands that on April 2, 2003 Boeing received a Hydraulic Project Approval (HPA) from the Washington Department of Fish and Wildlife. It is also our understanding that Boeing is actively negotiating an access agreement from the Jorgensen Forge and that within 15 days from a receipt of such agreement Boeing will begin the field work. EPA encourages Boeing to notify EPA as soon as possible if there are difficulties in obtaining the access agreement so that we may work with all parties concerned to facilitate timely assess and implementation of the Plan.

Should you have any questions please don't hesitate to call me at 206/553-5122.

Sincerely,



Anna I. Filutowski
Project Manager

Enclosure

cc: Hideo Fujita, Ecology -NWRO